



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

KATHRYN M. SPROVIERI
Assistant Corporation Counsel
Phone: (212) 356-2383
Fax: (212) 356-3509
Email: ksprovie@law.nyc.gov

October 7, 2015

BY ECF

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Stephen Priveterre v. Matthew Forte, et al., 14 Civ. 8841 (KPF)

Your Honor:

I am the Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to represent defendants Lieutenant Anthony Ronda and Detectives Eric Ortiz, Matthew Forte, and Richard Baez in the above-referenced matter. I write in response to the Court's Valentin Order, dated August 27, 2015, in which this office was ordered to ascertain the identities of any known officers whom were present during the execution of the search warrant at plaintiff's apartment on June 8, 2012.

The undersigned states that, upon information and belief, in addition to Lieutenant Ronda and Detectives Ortiz and Forte, who are named defendants and who have already filed their answer in this action, the following officers were involved in the execution of the search warrant at plaintiff's apartment located at 2028 2nd Ave., Apartment 3N, New York, NY on June 8, 2012:

- Captain Sean Charlson; Narcotics Borough Manhattan North, 1 Police Plaza, Room 1100, New York, NY, 10038;
- Detective Oscar Fernandez; Shield number 7103; Narcotics Borough Manhattan North, 1 Police Plaza, Room 1100, New York, NY, 10038;
- Detective Christopher Herdia; Shield number 1339; Narcotics Borough Manhattan North, 1 Police Plaza, Room 1100, New York, NY, 10038;
- Detective Keith Carpenter; Shield number 5123; Narcotics Borough Manhattan North, 1 Police Plaza, Room 1100, New York, NY, 10038;

- Detective Jamal Hairston; Shield number 203; Narcotics Borough Manhattan North, 1 Police Plaza, Room 1100, New York, NY, 10038;
- Detective Carlos Sierra; Shield number 2246; Manhattan Court Section; 1 Police Plaza, Room S139, New York, NY 10038;
- Officer Andre Reyes; Shield number 14634; 1st Precinct, 16 Ericsson Place, New York, NY, 10013; and
- Sergeant Joey Alix; Shield 456; Transit Bureau District 11, 161st Street, Bronx, NY, 10451.

Additionally, upon information and belief, former Detective Robert Frank was also involved in the execution of the search warrant on plaintiff's apartment, however he is no longer employed by the New York City Police Department, and thus, a service address for him cannot be provided at this time.

Lastly, as stated during the August 27, 2015 telephone conference, upon information and belief, Detective Richard Baez, who is a named defendant in this action, was not involved in the execution of said search warrant on plaintiff's apartment on June 8, 2015.

This Office is continuing to investigate this matter and will supplement this response if more information becomes available.

I thank the Court for its attention to this matter.

Respectfully submitted,

/S

Kathryn M. Sprovieri
Assistant Corporation Counsel

cc: Stephen Priveterre (*by regular mail*)
Plaintiff Pro Se
13-R-0063
Queensboro Correctional Facility
47-04 Van Dam Street
Long Island City, NY 11101-3081